

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

IN RE:)	CASE NO. 18-50455
)	
MICHAEL JAMES GARVEY)	
)	CHAPTER 13
SSN: XXX-XX-6227)	
)	
DEBTOR.)	

OBJECTION TO DEBTOR’S MOTION FOR LOAN MODIFICATION MANAGEMENT

NOW COMES, Nationstar Mortgage *dba* Mr. Cooper (“Nationstar”), by and through its undersigned attorney, and responds to the Debtor’s Motion to for Loan Modification Management (“Motion,” D.E. 76). In support thereof, Nationstar shows the Court the following:

1. On or about July 13, 2018, Debtor filed this bankruptcy case.
2. Nationstar is a secured creditor in this bankruptcy case, holding a Note secured by real property, which serves as the Debtor’s principal residence, located at 330 Walter Godbey Road, West Jefferson, North Carolina 28694, and is more particularly described in a Deed of Trust recorded in Book 00311, Page 0347, Ashe County Registry, North Carolina.
3. On or about January 9, 2020, Debtor filed Motion for Loan Modification Management (“LMM”), proposing monthly adequate protection payments in the amount of \$363.34 during the LMM period.
4. Nationstar declines participation in the LMM program as to this loan. The loan is already under review for potential loan modification options.

WHEREFORE, Nationstar Mortgage *dba* Mr. Cooper respectfully requests the Court as follows:

1. That the Debtor’s motion be denied; and
2. For such other and further relief as the Court deems proper

This, the 30th day of January 2020.

HUTCHENS LAW FIRM LLP

BY: /s/ Joseph J. Vonnegut
JOSEPH J. VONNEGUT
Attorney for Nationstar Mortgage *dba* Mr. Cooper
Post Office Box 2505
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Fayetteville, North Carolina 28302
(910) 864-2668
(910) 864-6177 fax
NC State Bar No: 32974

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date this *OBJECTION TO DEBTOR'S MOTION FOR LOAN MODIFICATION MANAGEMENT* was served upon the following parties by depositing a copy enclosed in a postpaid, properly addressed wrapper in a post office or official depository under the exclusive care and custody of the United States Postal Service or via the appropriate electronic servicer:

Debtor:

Michael James Garvey
330 Walter Godbey Road
West Jefferson, NC 28694

Attorney for Debtor:

Beth Carter
The Law Office of Beth B Carter, PLLC
P.O. Box 1553
Denver, NC 28037

Chapter 13 Trustee:

Steven G. Tate
212 Cooper Street
Statesville, NC 28677

Bankruptcy Administrator

402 West Trade Street
Suite 200
Charlotte, NC 28202

This, the 30th day of January 2020.

HUTCHENS LAW FIRM LLP

BY: /s/: Joseph J. Vonnegut

JOSEPH J. VONNEGUT

Attorney for Nationstar Mortgage *dba* Mr. Cooper

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